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February 2, 2022

Hon. Kiyo A. Matsumoto
United States District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Broecker et al., v. Scheinman Arbitration et al
Docket No.: 21-cv-6387
VBPNP File No.: 72-066

Dear Judge Matsumoto:

This office was recently retained to represent Defendants Martin F. Scheinman, Scheinman Arbitration and Mediation Services, and Scheinman Arbitration and Mediation Services, LLC (hereinafter "Scheinman") in the above referenced matter.

Pursuant to this Court's Order dated 1/27/22, the newly-named Defendants were directed to file responses to letters requesting a pre-motion conference by Defendants United Federation of Teachers and Defendants New York City Department of Education and Meisha Porter. Scheinman Defendants do not oppose the above-mentioned letters and concur with the proposed briefing schedule.

Of note, Scheinman Defendants intend to seek a pre-motion conference on and/or leave to file a pre-answer motion to dismiss the Amended Complaint based on, *inter alia*, arbitrators' quasi-judicial immunity and a complete lack of any allegations giving rise to a cognizable §1983 conspiracy claim. A letter seeking same will be filed in a timely manner in accordance with this Court's Rules. The undersigned will confer with the parties regarding a proposed briefing schedule.

Respectfully submitted,
Karolina Wiaderna
Karolina Wiaderna

cc: all counsel of record